

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

ANAMARIE HANNAY, ADDA GAPE,  
and JOHN KOHL,  
Plaintiffs,  
v.  
AMERICAN FEDERATION OF STATE,  
COUNTY, AND MUNICIPAL  
EMPLOYEES, OHIO COUNCIL 8; KENT  
STATE UNIVERSITY EMPLOYEES  
LOCAL 153; RALPH M. DELLA RATTA,  
Chair, Board of Trustees of Kent State  
University, SHAWN M. RILEY, Vice  
Chair, VIRGINIA C. ADDICOTT, Trustee,  
MARGOT JAMES COPELAND, Trustee,  
REV. DR. TODD C. DAVIDSON, Trustee,  
ROB S. FROST, Trustee, ROBIN M.  
KILBRIDE, Trustee, DONALD L.  
MASON, Trustee, STEPHEN A. PERRY,  
Trustee, CATHERINE L. ROSS, Trustee,  
MICHAEL D. SOLOMON, Trustee, all in  
their official capacities; and F. JACK WITT  
III, Vice President for Human Resources,  
Kent State University, in his official  
capacity.  
Defendants.)  
No. 5:19-cv-00951

**MOTION FOR PRO HAC VICE ADMISSION OF JEFFREY M. SCHWAB,  
ESQ., ON BEHALF OF PLAINTIFFS, ANNAMARIE HANNAY, ADDA GAPE,  
and JOHN KOHL**

Daniel J. Dew, trial counsel for Plaintiffs Annamarie Hannay, Adda Gape, and John Kohl, respectfully moves this Court pursuant to Loc. R. 83.5(h) for the admission *pro hac vice* of Jeffrey M. Schwab, Esq., of the Liberty Justice Center, to represent Plaintiffs as counsel or co-

counsel in this case.

Movant represents that Mr. Schwab is a member in good standing of the highest court of the state of Illinois (Ill. Bar No. 6290710, admitted Nov. 9, 2006) as attested by the certificate of good standing attached hereto as Exhibit A. Movant also represents that Mr. Schwab is not eligible for admission to the permanent bar of this Court and has not been disbarred or suspended from the practice of law.

This Motion is accompanied by the required filing fee. The applicant for admission *pro hac vice* understands that, unless expressly excused, he must register for electronic filing with this Court promptly upon the granting of this Motion.

Mr. Schwab's contact information is as follows:

Jeffrey M. Schwab, Esq.

Business Email: jschwab@libertyjusticecenter.org

Business Telephone: (312) 263-7668

Business Fax: (312) 263-7668

Business Address:      Liberty Justice Center  
                                  190 South LaSalle Street, Suite 1500  
                                  Chicago, Illinois 60603

Respectfully submitted,

/s/Daniel J. Dew  
Daniel J. Dew  
Ohio Bar No. 89502  
The Buckeye Institute  
88 East Broad Street, Suite 1120  
Columbus, OH 43215  
Telephone (614) 224-4422

*Counsel for Plaintiffs*

